

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

United States of America,	)	Case No. 1:16CR00265
	)	
	)	
Plaintiff,	)	Hon John R. Adams
	)	
	)	<b><u>MOTION TO DESIGNATE CASE AS</u></b>
	)	<b><u>COMPLEX “MEGA-CASE” FOR</u></b>
v.	)	<b><u>BUDGETING PURPOSES</u></b>
	)	
	)	David L. Doughten (0002847)
Erick Jamal Hendricks,	)	4403 St. Clair Avenue
	)	Cleveland, OH 44103
	)	Telephone: (216) 361-1112
Defendants.	)	<a href="mailto:ddoughten@yahoo.com">ddoughten@yahoo.com</a>
	)	
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	)	
	)	<i>Counsel for Defendant Hendricks</i>
	)	

Now comes Defendant Erick Jamal Hendricks, by and through counsel, and respectfully requests that the Court designate this case as a complex “mega case” for budgeting purposes. As the Court is aware, this is a somewhat high profile case. In addition to having voluminous discovery to review, it is anticipated that there will be CIPA and FISA issues as well, and it is highly likely that the case will involve a multi-week trial. Counsel was directed by the Sixth Circuit Budgeting Attorney to file this motion to have this case so designated for purposes of the Criminal Justice Act.

Wherefore, Defendant Erick Jamal Hendricks respectfully requests that the Court issue an order designating this as a complex “mega case” for budgeting purposes.

Respectfully submitted,

STEPHEN D. HARTMAN (0074794)

By /s/ Stephen D. Hartman  
*Co-Counsel for Defendant Hendricks*

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### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been electronically filed this 21st day of March, 2017. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s System.

/s/ Stephen D. Hartman